

## HUMAN RIGHTS POLICY

### CONTEXT:

Castor & Pollux Consulting LLP (the “Company” or “We” as per the required context) is committed to respecting the human rights of its employees, communities and those affected by its operations, wherever it does its business, including our business partners, vendors, contractors, and suppliers. Therefore, in the management of its businesses and operations, the Company strives to uphold the spirit of human rights, as enshrined in the Constitution of India, existing international standards, and the applicable laws of the country of operations.

We are committed to upholding human rights across the value chain and are guided by the Universal Declaration of Human Rights, International Labour Organization conventions, and the UN Guiding Principles on Business and Human Rights. We are committed to supporting and aligning our operations and actions to the UN Global Compact’s Principles on human rights and labour. In alignment with the UN Guiding Principles, we continuously explore opportunities to identify and mitigate any human rights risks for our employees, children, migrant workers, third-party contract labour, etc.

### WHO DOES THIS POLICY APPLIES TO:

This policy applies to all the employees, Directors, officers of the Company. The Company expects its business partners, vendors, contractors and suppliers to treat their employees, and to interact with communities in ways that respect human rights and adheres to the spirit and intent of our Human Rights Policy. The Company requires its business partners, vendors, contractors, and suppliers to adhere to all domestic laws.

### PRINCIPLES:

The Company is committed to conducting business in an ethical and responsible manner. This includes respecting internationally recognized human rights throughout our operations. Human rights are fundamental rights and freedoms that all people are entitled to, regardless of race, sex, nationality, ethnicity, language, religion, or any other status.

In accordance with our core value of respect for people, we are committed to dealing with every person in an equal and inclusive way.



These principles require all employees around the world to act with fair and lawful conduct toward other employees, colleagues, business partners and local communities.

The important principles of the Company's policy on Human Rights are mentioned below:

## **1. PROHIBITION OF CHILD LABOUR, FORCED LABOUR, AND SLAVERY:**

The Company has zero tolerance towards and prohibits engagement of child labour, forced labour, slavery, and any form of human trafficking. The Company is committed to ensuring that no instance of child labour, forced labour, slavery or human trafficking occurs in any of its operations and establishments, and supply chain. The Company does not engage any individual for work who is less than 18 years of age.

The Company has established robust process to monitor and ensure non-engagement of an individual below 18 years for work. The Company will not make use of slave, forced or compulsory labour in any form. The employees are made fully aware of the terms and conditions relating to employment prior to recruitment/ at the time of interview. The Company does not seek and retain identity documents nor any monetary or non-monetary deposits for their employment. The Company does not withhold any part of any employee's wages, benefits, property, to force such employee to continue working for the Company.

The Company prohibits associated vendors, contractors, and suppliers from engaging child and/or forced labour, slavery, or any form of human trafficking. The Company also expects them to have and uphold similar standards and abide by the domestic laws in the countries wherein they operate. Any violation of these principle by them shall result in discontinuation of business association with the Company.

## **2. FREEDOM OF ASSOCIATION AND THE RIGHT TO COLLECTIVE BARGAINING:**

The Company recognizes and respects the right of its employees to exercise freedom of association in matters related to their employment, as per policies and procedures of the Company, without them having any apprehension.

The Company observes laws and regulations around the world relating to freedom of association and is committed to and respects the right of collective bargaining of its employees, as per applicable laws/guidelines/regulations.

The Company shall strive to put efforts into promoting awareness on Freedom of association in our employees and interested parties, monitor and measure the process against the requirement and take actions to continuously improve the system.



### **3. EQUAL OPPORTUNITY, NON – DISCRIMINATION, DIVERSITY AND INCLUSION:**

The Company encourages an inclusive work environment, wherein diversity is valued, and equal opportunities are available to all the employees and stakeholders. The Company follows applicable laws and regulations in the matter of deciding wages, hours of work and welfare measures and its Code of Business Conduct and Ethics. The Company endeavors that the work environment across its operations remain free from discrimination in any form.

The Company prohibits discrimination in the matter of compensation, training, opportunities, and employee benefits based on caste, creed, religion, language, ethnicity, disability, age, gender, sexual orientation, race, colour, marital status or union organization or any other status protected by appropriate laws.

The Company will not discriminate against any employee infected by HIV regarding promotions, training and other privileges applicable to all employees. A HIV positive employee will be allowed to work until medical conditions interfere with the specific job being done, in which case reasonable alternative working arrangements will be made; or the employee is incapacitated to perform duties and is declared medically unfit by a qualified doctor, in which case the employee will be assisted to rehabilitate outside the Company.

The Company does not tolerate disrespectful or inappropriate behavior, unfair treatment or retaliation of any kind. Harassment is not tolerated in the workplace and in any work-related circumstance outside the workplace.

We also ensure that equal remuneration is paid to all our employees for work of equal value. The basis for recruitment, hiring, placement, development, training, compensation, and advancement at the Company is qualifications, performance, skills and experience.

The Company encourages all employees and individuals who provide services in our workplace to report instances of discrimination, whether personally experienced or observed in the workplace, at any level. Individuals should promptly report violations. Any allegations made in these matters are handled critically and confidentially. Violation of these cardinal principle may result in disciplinary actions which include termination, loss of pay, as well as other legal proceedings.

### **4. WORKING HOURS, WAGES AND BENEFITS:**

The Company compensates employees competitively relative to the industry and local labour market, and in accordance with terms of applicable collective bargaining



agreements. We work to ensure full compliance with applicable wage, work hours, overtime and benefits laws.

## **5. SAFE AND HEALTHY WORKPLACE:**

The Company is committed to maintaining a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions for all. The safety and health of our employees is of paramount importance. Our policy is to provide a safe and healthy workplace and comply with applicable safety and health laws and regulations, as well as internal requirements. The Company works to provide and maintain a safe, healthy and productive workplace, in consultation with our employees, by addressing and remediating identified risks of accidents, injury, and health impacts. We encourage them to report any unsafe or hazardous conditions noticed in the workplace to the management. The Company shall ensure creche is provided for the safety and wellbeing of children of the employees as per the requirements of the domestic laws of the country of its operations and as per its policy on Safety Health and Environment.

## **6. PREVENTION OF SEXUAL HARASSMENT**

The Company is committed to protect the employees from sexual harassment and ensures the compliance with The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013. The Company recognizes that protection of employees against sexual harassment and the right to work with dignity are universally recognised human rights by international conventions. The Company shall deal expeditiously and fairly as per its policy for prevention of Sexual Harassment.

## **7. COMMUNITY AND STAKEHOLDER ENGAGEMENT**

The Company recognizes that it plays an important part of the communities in which it operates. The Company engages with communities on human rights matters that are important to them such as access to water and health. The Company's aim is to ensure considering their views through dialogue as it conducts business. Wherever appropriate, the Company engages with civil society and stakeholders on human rights issues related to its business.

## **8. TRANSPARENCY**

The Company strives to have a workplace in which open, transparent and honest communications are valued and respected. Communication and transparency are the only means by which the employees can exchange ideas, information, communication, etc.



Therefore, the Company is committed to promoting transparency and communication within the organisation.

## 9. GRIEVANCE MECHANISM:

The Company believes that employees should have the opportunity to raise and achieve resolution by following a fair and prompt grievance process, without fear of retaliation.

The Company provides a grievance mechanism for employees to raise occupational concerns. This mechanism is accessible, understandable, and transparent to employees. Issues raised are dealt promptly, without any reprisal. This mechanism also provides employees with the option of flagging concerns anonymously.

Employees and Third Parties acting on behalf of Castor & Pollux Consulting's shall immediately report any noticed or suspected violations of this policy in good faith by:

1. Accessing <https://cnpc.ethicspoint.com>. The link can be accessed through Intranet and the Company's website.
2. Calling on the hotline number. List of hotline numbers are available in 'Raise a Concern by Phone' section of <https://cnpc.ethicspoint.com>. The hotline is available 24x7 in multiple languages.
3. Writing to [complianceofficer@castorpollux.in](mailto:complianceofficer@castorpollux.in) or [chiefombudsperson@castorpollux.in](mailto:chiefombudsperson@castorpollux.in).
4. By Post/ Courier to:

Chief Compliance Officer / Chief Ombudsperson,  
Castor & Pollux Consulting LLP  
61B, Extn 2B, Nangloi , New Delhi 41

Employees may choose to remain anonymous while raising concern. However, employees are encouraged to identify yourself, as doing so can help resolve the situation, especially if we need to follow up for additional information. Every reasonable effort shall be made to keep employee's identity confidential.

Company believes in non-retaliation against employees or third parties for raising concerns in good faith or who assist in an investigation of suspected wrongdoing. Please refer to the Ombudsperson Policy and Non-Retaliation Policy for further information.

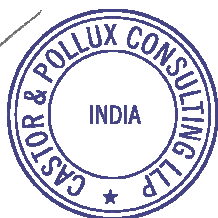


This policy has been framed by the Company for human rights and to ensure there is no violation of human rights within the organization.

The Company reserves its right to amend this policy at any time.

The policy will be reviewed periodically once every 3 (three) years.

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